201-14903

Karen Hoffman
12/16/03 02:29 PM

To: Michael Ofner/DC/USEPA/US@EPA, Barbara Leczynski/DC/USEPA/US@EPA
cc:
Subject: Environmental Defense comments on Thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide (CAS# 18760-44-6)

----- Forwarded by Karen Hoffman/DC/USEPA/US on 12/16/03 02:28 PM -----

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Subject: Environmental Defense comments on Thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide (CAS# 18760-44-6)

(Submitted via Internet 12/16/03 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov, boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and Sarah_McLallen@americanchemistry.com)

Environmental Defense appreciates this opportunity to submit comments on the robust summary/test plan for Thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide (CAS# 18760-44-6).

The American Chemistry Council Petroleum Additives Panel Health, Environmental, and Regulatory Task Group (HERTG) has submitted a Robust Summary/Test Plan describing available data and testing needs for a lubricant additive, thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide. If there are other uses of this chemical, they should be described as well.

The Test Plan submitted for thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide indicates that data addressing its properties and toxicity are very limited. The studies described in this submission indicate thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide has low mammalian toxicity, but environmental concern is raised by the fact that it is quite toxic to algae and is only slowly degraded in the environment. The shipment of large volumes of thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide in concentrated "additive packages" to formulators of finished lubricants poses a particular risk of accidental spills and resulting human and environmental exposure. An accident involving a tank car or truck containing this material could have a significant adverse environmental impact if, for example, it resulted in a release into a waterway. Environmental concern is also raised by the fact that finished lubricants containing this chemical are used in cars and trucks maintained by service personnel and consumers who may be largely unaware of the potential for environmental contamination resulting from inappropriate disposal of used lubricants.

In sum, in spite of the fact that thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide has significant potential for human exposure and may be widely distributed in the environment, it has been the subject of very few studies to characterize its environmental or human toxicity. Most of the SIDS elements requested under EPA's HPV Challenge Initiative have not been addressed. However, we are pleased to note that those SIDS elements that have been addressed are -- with the exception of those for acute toxicity -- recent, well designed and were conducted under GLP. We are also pleased to note that the Test Plan submitted by HERTG for thiophene,

3-(decyloxy)tetrahydro-, 1,1-dioxide proposes to conduct studies using appropriate OECD guidelines for each of the SIDS elements not currently addressed by adequate studies. We strongly support the studies proposed and agree that they and the data provided should allow for a screening-level hazard characterization of thiophene, 3-(decyloxy)tetrahydro-, 1,1-dioxide.

Thank you for this opportunity to comment.

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